

Re Carbon Gözetim Denetim ve  
Belgelendirme Ltd. Şti.

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## Handling of Complaints, Appeals and Disputes Procedure




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## 1. Purpose

The purpose of this procedure is to ensure fast and appropriate handling of disputes, complaints and appeals related to Re Carbon Ltd.'s validation and/or verification/certification activities that are raised by a client and/or other possible validation/verification stakeholders.

## 2. Responsibility

- Quality Manager
- Sales Manager
- Certification Manager
- General Manager
- Team Leader(s)

## 3. Definitions

Please see DOE Glossary of Terms

## 4. Complaint process

Complaints are expressed and communicated to Re Carbon Ltd. (Company) either formally (written) or informally (verbal). Complaints shall be related to validation or verification/certification services executed by the Company and are processed as per the below described procedure:

### 4.1. Verbal Complaint:

A verbal complaint is recorded by the Company's personnel receiving the complaint through filling out the "**Complaint/Appeal/Dispute Record Form**" and passing this record to the Sales Manager.

After reception of such a recorded complaint, the Sales Manager sends a copy of the record to the complainant in order to obtain verification whether the complaint was appropriately stated and seeks confirmation.

### 4.2. Written complaint


By filling out and sending to the Sales Manager the "**External Complaints Form**", a written complaint is received. This form is available for download under <https://www.re-carbon.net/en/handling-of-complaints-and-appeals/>

In both cases (complaints made written or verbally), the complaint is recorded by the Sales Manager using the "**Complaint/Appeal/Disputes Record Form**" and the process continues as defined below.

The validity of complaints is assessed by the Quality Manager, in terms of whether the company's Quality Management System is at fault or not. This is important, as trends can be monitored in the nature of complaints and in order to reduce repetitive complaints on the same matter. It is used as an incentive to improve the Quality Management System, if necessary.

Validity of complaints are based on the below specified criteria:

- Delays in delivery of the service,
- Violation of conflict of interest,
- Competence of the validation/verification team,
- Customer service,

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- Actions that are contrary to the Accreditation Body(ies) rules and requirements, legislative requirements and/or the Company's validation & verification procedures,
- Comments during the publicly available comment period, which the Company has not taken into account
- Actions carried out or caused by the Company's personnel related to PPs (e.g. non-professional behaviour, unethical behaviour, breaches of confidentiality, etc)

Within 5 (five) business days upon reception of a complaint, the Sales Manager sends (via email) the complainant a confirmation of the received complaint. Within this email the complainant is informed that any decision regarding the complaint will not result in any discrimination and/or different attitude against the complainant and that the complaint will be assessed based on the principle of confidentiality.

Simultaneously, an internal committee, comprised of the Certification Manager, the Quality Manager and the Sales Manager initiates an internal investigation by using the "**Root Cause Analysis Report Form**",

The internal committee will ensure that:

- The Complainant was informed that the complaint has been received,
- Sufficient information is obtained from involved parties,
- The validity of the complaint is verified,
- An appropriate investigation is carried out,
- Details of the complaint are recorded, and
- Appropriate corrective/preventive action is executed, if necessary.

If necessary, the internal committee may ask for technical assistance from a team leader and/or validator/verifier and/or a technical expert with the required competence.

The Committee will complete the investigation within 15 (fifteen) business days of the meeting date. In case additional time is required by the Committee (to assess the complaint completely and to resolve it), the Sales Manager informs the complainant accordingly.

A decision regarding the complaint is taken mutually by the Committee members. In cases where the Committee cannot reach a mutual decision, the final decision on the matter is being taken by the Quality Manager.


In cases where the complaint is against either the Sales Manager, the Quality Manager or the Certification Manager, the assessment of the complaint and decision taking processes are executed solely by the General Manager.

In cases where the complaint is against the General Manager, the validity of the complaint is assessed by the Quality Manager and a decision is taken by the other members of the Committee (other than the General Manager) and is submitted to General Manager for her (his) final view and then submitted to the complainant.

The Company takes the full responsibility, during all stages regarding the relevant complaint.

In case the decision is ruled in favour of the complainant, an appropriate corrective action is executed by the Company and its effectiveness is monitored by the Quality Manager. The complainant is being informed of such case.

In case the decision is ruled not in favour of the complainant, the Sales Manager informs the complainant accordingly and discusses a solution.

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The complaint is settled when the complainant accepts the suggested solution or if the parties reach a mutual agreement. In case, the complainant does not accept the proposed solution, either the appeal process (see below) or a lawsuit may be initiated by the complainant.

The committee's meeting results (including the root cause analysis and the corrective/preventive actions) are noted by the Quality Manager in the "**Meeting Minutes Form**". These are being kept as a record in the Company.

### 4.3. Appeal process

The "Appeal Procedure" is applicable only to clients which have signed a service agreement with the Company.

Appeals regarding the decisions on complaints submitted to the Company and/or the final opinions on validation/verification activities are assessed by the external Appeal Committee, comprised of three members including its Chairman.

Following the reception of an appeal request, the appeal is recorded by the Sales Manager using the "**Complaint/Appeal/Dispute Record Form**".

Upon reception of an appeal, the Sales Manager sends the appellant a confirmation of the received appeal, within five business days via email.

Simultaneously the Sales Manager informs the appellant that a decision regarding the complaint shall not result in any discrimination and/or different attitude against the appellant.

Followed by sending the confirmation, the Sales Manager informs the Appeal Committee members by issuing a call for a committee meeting via e-mail. It is ensured that the committee meets in the shortest possible time.

Appeals are evaluated with respect to the Company's confidentiality policy and its validity. The validity of appeals is based on its link to the related service and/or project.

The Committee investigates the case and assess the accuracy of the relevant information, makes an analysis and conducts an on-site investigation, if necessary.


The Committee completes its investigation within 30 business days of the meeting date and submits its opinion in form of a report to the Sales Manager. In cases where additional time is required by the Committee to assess the appeal completely and to resolve it, the Sales Manager informs the appellant accordingly.

The appellant is informed formally by the Sales Manager about the outcome of the investigation and the result of the appeal.

Committee meeting decisions are noted in the "**Meeting Minutes Form**", which are kept as a record in the Company.

In case a decision is ruled in favour of the appellant, an appropriate corrective action is being taken by the Company and its effectiveness is monitored by the Quality Manager. This is communicated by the Sales Manager to the appellant.

In case a decision is ruled against the appellant, the Sales Manager informs the complainant about the outcome of the Committee meeting and discusses a solution.

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The appeal is settled when the appellant accepts the suggested solution or if the parties reach a mutual agreement. In case the appellant is not satisfied with the decision of the Appeal Committee, the appellant may complain directly to the CDM Executive Board and/or the Accreditation Body.

#### 4.4. Evaluation of dispute

Any dispute that may occur during a validation/verification activity and that did not reach a consensus is recorded by the Team Leader together with the justification of both parties and is submitted to the Sales Manager.

Disputes are being recorded using the “**Complaint/Appeal/Dispute Record Form**”.

Simultaneously, an internal Committee comprised of the Certification Manager, the Quality Manager and the Sales Manager, will initiate an internal investigation via using the “**Root Cause Analysis Report Form**”.

The Committee assesses whether the dispute is valid, based on criteria specified below, including gathering and verifying all necessary information:

- If the dispute relates to a disagreement or argument between the client and the Company about a decision the Company or a client has made
- Any matter or issue in dispute between the parties arising out of or connected to the service agreement
- Incorrect application of a methodology by the validation/verification team,
- Non-fulfilment of a clear accreditation requirement.

Disputes shall be considered invalid:

- If the above mentioned criteria are not fulfilled, or
- If the Company was acting in a manner necessary to fulfill the accreditation requirements and the decision regarding the dispute was justified.

If a dispute is deemed “valid”, an investigation is being carried out by the Committee.


The Committee will ensure that:

- The disputant was informed that the disputed matter was received
- Sufficient information is obtained from involved parties,
- The validity of the dispute is verified,
- An appropriate investigation is carried out,
- Details of the dispute are recorded, and
- An appropriate corrective/preventive action is requested, if necessary.

The Committee, completes its investigation within 15 business days of the meeting date. In cases where additional time is required by the Committee to assess the dispute completely and to resolve it, the Sales Manager informs the disputant about this issue.

A decision regarding the dispute is taken mutually by the Committee members. However, if the Committee cannot reach a mutual decision, the final decision is taken by the Quality Manager.

The disputant is informed formally by the Sales Manager about the outcome of the investigation and the result of the dispute.

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In case the decision is ruled against the disputant, the Sales Manager informs the disputant about the decision of the Committee meeting and discusses a solution.

The dispute is settled when the disputant accepts the suggested solution or if the parties reach a mutual agreement. In case, the disputant does not accept the proposed solution, a lawsuit may be initiated by the disputant.

Committee meeting results including the root cause analysis and the corrective actions (if applicable) are noted in the “**Meeting Minutes Form**” by the Quality Manager and are being kept as a record in the Company.

As a general principle, the Committee members involved in the assessment of complaints, disputes and appeals are different from those who carried out the validation or verification/certification activities.

The Company’s policy and procedures about handling appeals, complaints and disputes are published on [www.re-carbon.net](http://www.re-carbon.net).

All complaints, disputes and appeals are recorded by the Sales Manager in the “**Complaint/ Appeal/Dispute List**” and the records of complaints, appeals and disputes are kept according to the “**Control of Records Procedure**”.

All complaints, disputes and appeals are being discussed during the Management Review Meetings and the required analysis is carried out accordingly.

### 5. Related Documents

- CDM Accreditation Standard Version 07.0 Section 14
- ISO 14065:2020, Clause 9.10
- ISO/IEC 17029:2019, Clause 9.10
- F-C-033 Meeting Minutes Form
- F-C-052 Root Cause Analysis Report Form
- F-C-056 Complaint/Appeals/Disputes Recording Form
- F-C-057 External Complaints Form
- L-C-03 Complaint/Appeal/Dispute List
- DOE Glossary of Terms

### History of the document

Version No.	Date	Summary of the revision	Prepared by	Approved by
00	23.01.2023	Initial publication of the procedure within Re Carbon Ltd. documentation in accordance with the requirements of ISO 14065:2020 and ISO/IEC 17029:2019 standards and the CDM Accreditation Standard	Aslı Bingöl Quality Manager	Christian Johannes General Manager